

Exhibit A

Re: Step 1 – “Location History” (“LH”) Setting

Google states that “the user must opt into LH in her account settings” See ECF No. 96-1 at 3; ECF No. 59-1 at 7.

1. Produce all records indicating when and/or how Mr. Chatrie opted into the “Location History” setting.
 - If records exist:
 - Identify the date and method through which Mr. Chatrie opted into this setting.
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the opt-in process as Mr. Chatrie would have experienced it on his device at the time.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as Mr. Chatrie would have experienced it on his device at the time.
 - If such records do not exist:
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of ALL of the possible ways in which a user could have opted into this setting using a Samsung S9+ SM-G965U, running Android OS 8.0, revision number G965USQS3BRK3.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a user would have experienced it on this device.
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the way or ways in which a user could have opted into this setting using Google’s website interface from August 20, 2017, to June 14, 2019.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a web user would have experienced it.

Re: Step 2 – “Location Reporting” Setting

Google states that the user must also “enable ‘Location Reporting’—a subsetting within LH—for each particular device on which she wants to use LH.” See ECF 96-1 at 3; ECF No. 59-1 at 7-8.

2. Produce all records indicating when and/or how Mr. Chatrie opted into the “Location Reporting” setting.
 - If records exist:

- Identify the date and method through which Mr. Chatrie opted into this setting.
- Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the opt-in process as Mr. Chatrie would have experienced it on his device at the time.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as Mr. Chatrie would have experienced it on his device at the time.
- If such records do not exist:
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of ALL of the possible ways in which a user could have opted into this setting using a Samsung S9+ SM-G965U, running Android OS 8.0, revision number G965USQS3BRK3.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a user would have experienced it on this device.
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the way or ways in which a user could have opted into this setting using Google’s website interface from August 20, 2017, to June 14, 2019.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a web user would have experienced it.

Re: Step 3 – “Device-Location” Setting

Google states that “the user must ensure that the device-location setting on her mobile device is turned on.” See ECF No. 96-1 at 2; ECF No. 59-1 at 7.

3. Produce all records indicating when and/or how Mr. Chatrie opted-into the “device-location” setting.
 - If records exist:
 - Identify the date and method through which Mr. Chatrie opted-in to this setting.
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the opt-in process as Mr. Chatrie would have experienced it on his device at the time.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as Mr. Chatrie would have experienced it on his device at the time.
 - If such records do not exist:

- Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of ALL of the possible ways in which a user could have opted into this setting using a Samsung S9+ SM-G965U, running Android OS 8.0, revision number G965USQS3BRK3.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a user would have experienced it on this device.

Re: Step 4 – Permit Location Sharing with Google

Google states that “the user must configure her mobile device to share location information with applications capable of using that information. Not all mobile applications can use location information, and those that can, such as Google Maps, will do so only if the user configures her device to allow the app to use the mobile device’s location information.” See ECF No. 59-1 at 7.

4. Produce all records indicating when Mr. Chatrue configured a device to share location information with Google applications.
 - If records exist:
 - Identify the date and method/application through which Mr. Chatrue first opted-in to sharing this information.
 - Provide all written documentation concerning the opt-in process for this setting as well as screenshots or a video of the opt-in process as Mr. Chatrue would have experienced it on his device at the time.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as Mr. Chatrue would have experienced it on his device at the time.
 - If such records do not exist, state which mobile applications were capable of using location on a Samsung S9+ SM-G965U, running Android OS 8.0, revision number G965USQS3BRK3.
 - Provide all written documentation concerning the opt-in process for all of these mobile applications as well as screenshots or a video of ALL of the possible ways in which a user could have configured this device to share location information with these applications.
 - For any screen that includes a button or hyperlink providing additional information (e.g., “Learn More” “More Information” “More,” etc.), provide screenshots or a video of that information as a user would have experienced it on this device.

Default Settings

5. Produce all documentation indicating the defaults for the “Location History,” “Location Reporting,” and “Device-Location” settings at the initial setup of a Samsung S9+ SM-G965U, running Android OS 8.0, revision number G965USQS3BRK3.

Version History

6. Produce all documentation indicating whether Google made changes to the opt-in processes for the settings identified in Steps 1-4 at any point during the time Android OS 8.0 was supported by Google.